

EXHIBIT C

PLAINTIFFS' 9.18.23 SCHEDULING PROPOSAL

From: Liz Shepherd <lshepherd@kytrial.com>
Sent: Wednesday, September 20, 2023 9:18 AM
To: Mayer, Marc; Joshua Salley; Goddard, Mark B.
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Subject: [EXTERNAL] RE: Does v Collins Murphy et al; DEPO OF COLLINS MURPHY 09-13-23
Attachments: Plaintiffs' 9.18 Draft Proposed New Schedule Chart(13944917.1).docx

All- attached is Proposed scheduling order. My concern is that we have yet to schedule our 309(b)(6) depositions and I anticipate that we will need to take several. Please let me know your thoughts. Liz

From: Mayer, Marc <marc.mayer@msk.com>
Sent: Tuesday, September 19, 2023 6:54 PM
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Subject: RE: Does v Collins Murphy et al; DEPO OF COLLINS MURPHY 09-13-23

All –

I just wanted to follow up on the proposed scheduling order. I believe that we are waiting on Plaintiffs to provide us with revisions to our draft. I'd like to avoid getting jammed up again at the end of the week, so please let us know when we can expect to receive Plaintiffs' proposal.

Also, at the deposition of Mr. Murphy, there were documents shown to the witness that we had never seen before (e.g. some sort of handwritten document). I am concerned that there are documents that have been produced in this action (perhaps by Limestone and/or Murphy?) that have not been provided to us. **Liz, Josh, or Jeffrey** – would you be able to provide us with copies of all documents produced by any party (other than MindGeek) or third party (other than those we subpoenaed) in this action? Also, can you confirm that there are no documents produced by Plaintiffs to other parties that have not been provided to us? If it would be helpful, we can provide an FTP link.

Thanks very much.

Event	Old Date	Proposed New Date
Pls.' Expert Disclosures	October 28, 2023	March 1, 2024
Defs. Expert Disclosures	November 28, 2023	April 1, 2024
Records Custodians Affidavits	November 30, 2023	July 31, 2024
Discovery Cut-Off for all discovery except that related solely to compensatory damages, including IMEs, Plaintiffs' and Defendants' Expert Disclosures, and discovery related to those Expert Disclosures	November 30, 2023	July 31, 2024
Deadline for filing of Dispositive Motions	December 30, 2023	September 16, 2024* *Briefing to conclude by December 20, 2024
Mediation	December 14, 2023	December 14, 2024
Hearing on Pending Dispositive Motions		???
Plaintiffs' Damages Expert Disclosures		Four months from decision on dispositive motions
Defs. Damages Expert Disclosures		Six months from decision on motions
Records Custodians Affidavits		Six months from decision on motions
Damages Discovery Cut-Off		Seven Months from decision on motions

Dispositive Motions Deadline		Eight months from decision on motions
Trial Not before		Nine Months from Decision on Motions